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13 *Attorneys for Defendant*  
 14 *Walmart, Inc.*

15 **UNITED STATES DISTRICT COURT**  
 16 **DISTRICT OF NEVADA**

17 ORTHULA OLETA HOLLINS, an individual,  
 18 Plaintiff,  
 19 vs.  
 20 WALMART, INC., d/b/a WALMART  
 21 #2050; WAL-MART STORES, INC.; WAL-  
 22 MART NEIGHBORHOOD MARKET; DOE  
 23 PROPERTY OWNER I-V; ROE PROPERTY  
 24 OWNER I-V; DOE EMPLOYEE I-V; ROE  
 25 JANITORIAL COMPANY I-V; ROE  
 26 MAINTENANCE COMPANY I-V; ROE  
 27 PROPERTY MANAGEMENT COMPANY  
 28 IV; DOE MAINTENANCE WORKER I-V;  
 29 DOE PROPERTY MANAGER I-V; DOE  
 30 EMPLOYEE I-V; ROE EMPLOYER I-V; and  
 31 ROE COMPANIES I-V, inclusive, jointly and  
 32 severally,  
 33 Defendants.

34 Case No.: 2:24-CV-02045-JAD-DJA

35 **STIPULATION AND [PROPOSED]**  
 36 **ORDER TO CONTINUE DISCOVERY**  
 37 **DEADLINES**

38 **[FIRST REQUEST]**

39 COME NOW Plaintiff ORTHULA OLETA HOLLINS, by and through her attorney of record,  
 40 DANIEL E. JOSLYN, ESQ., of the law firm of GINA CORENA & ASSOCIATES, and Defendant  
 41 WALMART, INC., by and through its attorneys of record, TABETHA A. MARTINEZ, ESQ., and  
 42 JAMES W. FOX, ESQ., of the law firm of BURGER, MEYER & D'ANGELO, LLP, and hereby

1 submit the following Stipulation and [Proposed] Order to Extend Discovery Deadlines (First Request)  
 2 for this Honorable Court's consideration (**proposed changes in bold**), seeking to extend the remaining  
 3 deadlines in the current scheduling order for a period of ~~sixty~~ (60) days for the reasons explained herein.  
 4 Pursuant to Local Rule IA 6-1(a), the parties hereby aver that this is the second discovery  
 5 extension requested in this matter.

6 **DISCOVERY COMPLETED**

- 7 • The parties have conducted a Rule 26(f) conference and served their respective Rule 26(a)(1)  
 8 disclosures and supplements thereto.
- 9 • The parties have exchanged written discovery and responses.
- 10 • Defendant has issued subpoenas to Plaintiff's relevant medical providers.
- 11 • On November 20, 2024, the Rule 35 Exam was conducted with Defendant's expert Dr.  
 12 Holman Chan
- 13 • On May 23, 2025, the parties exchanged Initial Expert Disclosures.
- 14 • The deposition of Plaintiff is currently set for June 27, 2025.
- 15 • The deposition of Walmart's 30(b)(6) Designee is currently set for July 10, 2025.

16 **II. REMAINING DISCOVERY**

- 17 • Depositions of Plaintiff's expert witnesses, John R. Peterson and Randa Bascharon, D.O.
- 18 • Depositions of Plaintiff's treating physicians
- 19 • Depositions of Walmart's employees
- 20 • Continued subpoenas to Plaintiff's medical providers.
- 21 • Additional written discovery as needed.

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**REASON FOR REQUESTING ADDITIONAL TIME TO COMPLETE DISCOVERY**

The Parties aver that good cause exists under Local Rule 26-3 for the requested extension being made at this time. The Parties have been diligently working to complete discovery in this matter. The Parties have: (1) engaged in written discovery; (2) disclosed and supplemented their FRCP disclosures; (3) scheduled multiple depositions; and (4) exchanged initial expert reports. Additionally, Plaintiff's Motion to Amend Complaint and Add Parties is pending the court's ruling. As such, good cause exists for extending the remaining discovery deadlines. The additional time will give the parties adequate time to take the depositions of Plaintiff's experts, Walmart's employees, and complete all remaining necessary discovery. The Parties have acted in good faith to request this extension and neither one has reason or intent to delay these proceedings or jury trial in this matter.

**IV. PRIOR DISCOVERY DEADLINES**

- According to the Court's Order Granting Stipulated Discovery Plan [ECF No. 12], the existing deadlines are:
  - Amend Pleadings/Add Parties: Expired
  - Initial Expert Disclosures: Expired
  - Rebuttal Expert Reports: Expired
  - Close of Discovery: July 25, 2025
  - Dispositive Motions: August 25, 2025
  - Joint Pre-Trial Order: September 24, 2025, or 30 days following the resolution of any outstanding dispositive motions.

**V. PROPOSED DISCOVERY DEADLINES**

- Amend Pleadings/Add Parties: Expired
- Initial Expert Disclosures: Expired
- Rebuttal Expert Reports: Expired
- **Close of Discovery:** **October 23, 2025**
- **Dispositive Motions:** **November 24, 2025**
- **Joint Pre-Trial Order:** **December 23, 2025, or 30 days following the resolution of any outstanding dispositive motions.**

1 If the extension is granted, all anticipated additional discovery should be concluded within the  
2 stipulated extended deadline. The parties aver that this request for extension of discovery deadlines  
3 is made by the parties in good faith and not for the purpose of delay.

4 Dated: June 26, 2025

GINA CORENA & ASSOCIATES

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*/s/Daniel E. Joslyn*

Gina M. Corena, Esq.  
Nevada Bar No. 10330  
Daniel E. Joslyn, Esq.  
Nevada Bar No. 14725  
Attorneys for Plaintiff

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9 Dated: June 26, 2025

**BURGER, MEYER & D'ANGELO, LLP**

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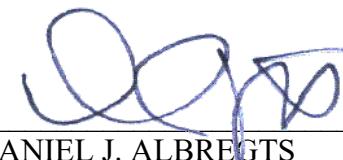
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DANIEL J. ALBREGTS  
UNITED STATES MAGISTRATE JUDGE